



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**MEMORANDUM**

**TO:** The Commission

**FROM:** Daniel A. Petalas  
Associate General Counsel for Enforcement

Kathleen Guith  
Deputy Associate General Counsel for Enforcement

**BY:** Mark Allen  
Acting Assistant General Counsel *MA*

Tracey L. Ligon *TL*  
Attorney

**SUBJECT:** MUR 6867 (Robert Telthorst) — Pre-Probable Cause Conciliation Agreement

**I. CONCILIATION**

Attached is a revised conciliation agreement by which Robert Telthorst ("Respondent") seeks to resolve knowing and willful violations of 52 U.S.C. §§ 30102(b)(3), 30104(b), and 30114 (formerly 2 U.S.C. §§ 432(b)(3), 434(b), and 439a) in connection with converting campaign funds to personal use, commingling campaign funds with personal funds, and failing to file accurate reports with the Commission. Attach. 1.

1 We believe the attached conciliation agreement represents a reasonable settlement under  
2 the circumstances. Therefore, we recommend that the Commission accept the attached signed  
3 conciliation agreement with Respondent Robert Telthorst, approve the appropriate letter, and  
4 close the file.

5  
6 **II. RECOMMENDATIONS**

- 7  
8 1. Accept the attached signed conciliation agreement with Robert Telthorst;  
9 2. Approve the appropriate letter; and  
10 3. Close the file.  
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